

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 4:22 CR 00471 HEA/JMB
	)	
GABRIEL J. VAMBOI,	)	
	)	
Defendant.	)	

**MOTION FOR PRETRIAL DETENTION AND HEARING**

Comes now the United States of America, by and through its Attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, John R. Mantovani, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the Government states as follows:

1. Defendant is charged with an offense for which a maximum twenty-year term of imprisonment is prescribed under Title 21.
2. There is a serious risk that the defendant will flee.
3. The defendant is a threat to the community.
4. The defendant is currently on Supervised Release case in Case Number 4:17CR00604 JAR, in which a warrant in this case has been issued for violating his Supervised release conditions.

WHEREFORE, the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

SAYLER A. FLEMING  
United States Attorney

/s/ John R. Mantovani  
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